

Remarks

Claims 1 and 4-10 are pending. By this Amendment, claim 1 has been amended and claim 3 has been cancelled. Reconsideration and allowance are respectfully requested in view of the above amendments and the following remarks. No new matter is believed added.

Claims 1 and 3-10 are rejected under 35 U.S.C. §102(b) over Werner (EP 0 840 522). This rejection is defective because Werner fails to teach each and every feature of the present invention as required by 35 U.S.C. §102(b).

Claim 1 presents a digital video-processing unit including a memory manager and a processor for processing input data into output data, wherein “an output of the processor is coupled to an input of the memory manager, wherein the memory manager is further arranged to transfer the output data signal from the processor to the memory means for storing the output data signal, and to transfer the stored output data signal from the memory means to the display unit, and wherein the memory manager is further arranged to transfer the stored data output signal from the memory means to the processor, and said processor is further arranged to execute a further operation on the stored data output signal.” Thus, the same processor in claim 1 processes input data into output data, transfers the output data to the memory means for output to a display unit, receives the stored output data signal it previously produced from the memory means, and executes a further operation on the stored output data signal. This operation is illustrated in FIG. 3 of the present patent application. Werner fails to teach a digital video-processing unit including such a memory manager and processor, and which is capable of providing the claimed data flow. On the contrary, Werner’s video processing unit 13 requires

the use of a memory manager 22 and a **pair of separate processing engines 24 (decoding engine) and 25 (scaling engine)**. In particular, as disclosed in Werner, col. 5, lines 28-31, “[s]eparate processing “engines” 24 and 25 perform these operations, first decompression and then resizing. These engines 24 and 25 share a memory 23 that stores the data to be operated on.” As such, the flow of data through Werner’s system is substantially different from the data flow claimed in claim 1 of the present invention.

In the above-referenced Final Office Action, the Examiner argues (page 2, last line, to page 3, line 3) that “[s]ince the processing engines 24 and 25 are fabricated in one integrated circuit, the integrated circuit would anticipate the claimed processor.” Applicant strenuously disagrees with the Examiner’s analysis and conclusion.

It should be noted that regardless of how Werner’s processing engines 24 and 25 are formed (same integrated circuit, different integrated circuits, etc.), the fact remains that two separate processing engines 24 and 25 are still required in Werner’s video processing unit 13. This is in sharp contrast with the claimed invention, wherein similar functionality is provided by a single processor and a shared memory. Further, because the present invention uses a single processor, the data flow in the present invention is substantially different than the data flow in Werner’s multi-processor video processing unit 13. In particular, because the present invention uses a single processor, the processor and memory manager execute different processes in time multiplex (i.e., the processor and memory manager execute different processes at different times (see, e.g., claim 1; specification, page 7, first full paragraph)). In Werner’s system, however, multiple processes are performed simultaneously by the processing engines 24 and 25 and

memory manager 22.

Accordingly, Applicant respectfully submits that claims 1 and 4-10 are in condition for allowance.

In light of the above, Applicant submits that all claims are in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicant's undersigned attorney at the telephone number listed below.

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Respectfully submitted,



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